

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
ROBERT P. GOODRICH,	)	
	)	
Petitioner,	)	
	)	
v.	)	Civil Action No. 03-12541-NG
	)	
TIM HALL,	)	
	)	
Respondent.	)	
_____	)	

**ASSENTED-TO MOTION TO IMPOUND**

The respondent, Tim Hall, through counsel, with the assent of the petitioner, Robert P. Goodrich, hereby respectfully requests that the Court impound the Amended Supplemental Answer, which is to be filed with this Court. As grounds for this motion, the respondent states that the original Supplemental Answer is to be amended to include an accurate copy of Exhibit 4, the Commonwealth's brief in the state court appeal. (The original Supplemental Appendix contained an incomplete draft version of this document.) The Amended Supplemental Appendix, like the original Supplemental Appendix, will contain confidential grand jury information. This Court has previously granted the motion to impound the original Supplemental Appendix, and the same concerns of confidentiality warrant impounding the Supplemental Appendix.<sup>1</sup> Moreover, Petitioner's counsel does not oppose this motion and granting this motion will not cause prejudice to any party.

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<sup>1</sup> The facts and circumstances regarding the inclusion of the grand jury testimony are set forth in greater detail in the respondent's Assented-to Motion to Impound, filed on March 11, 2004. The respondent incorporates that motion by reference herein.

WHEREFORE, for the foregoing reasons, respondent respectfully requests that this Court impound the respondent's Amended Supplemental Appendix.

Respectfully submitted,

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ATTORNEY GENERAL

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Assented:

ROBERT P. GOODRICH,

By his attorneys,

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Dated: January 7, 2005